

National Organic Standards Board
c/o Arthur Neil
Room 4008- South Building
1400 and Independence Av SW
Washington, DC 20250-0001

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Dear NOSB Chairman Riddle,

I wish to express my absolute and unequivocal support for the recent Livestock Committee Pasture Requirement recommendations. Enforcement of true access to true pasture is necessary so that all organic ruminants receive a significant portion of their total feed intake from true pasture.

Lactation is not a "stage of production" during which dairy cows may be denied pasture for grazing!!

Further, I support these additional recommendations:


- 1. "Pasture" should be defined as (a) land managed to maintain or improve soil, water, and vegetative resources and (b) to provide maximum feed value by growing suitable grasses and other forages from which animals graze plant material still connected to its roots.*
- 2. Organic dairy animals, from 12 months of age and up, must consume no less than 30% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three lactating dairy cows per acre.*
- 3. Farms not in compliance with the above should be allowed one year to come into compliance but will need to file an updated and enforceable farm plan, providing for adequate pasture.*

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality on all organic dairy farms.

Please do not adopt rules that destroy what hard-working organic farmers have put so much energy, time, sweat and tears into achieving. Factory farms are inherently counter to the principles of organic farming, and place far too much stress on the Earth's resources. We are stewards of the Earth, nothing more. We are borrowing it from our descendants. Proper organic standards will help us leave the place in better shape than we inherited it in. And at the end of the day, we know we've done our best.

Thanks for your time and consideration.

Sincerely,



Joellen Cross
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05-26-05